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Miedel & Mysliwiec LLP

MEMO ENDORSED

8/1/22

August 1, 2022

VIA ECF

The Honorable Colleen McMahon
 United States District Judge
 United States District Court
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

Bail is temporarily modified
 to allow defendant to travel
 as requested herein.

Re: *United States v. Maria del Carmen Valerio de Rodriguez, 22 Cr. 255 (CM)*

Dear Judge McMahon:

On March 9, 2022, the Hon. Sarah Netburn appointed me to represent Maria de Rodriguez in connection with the above-captioned case. The parties are next scheduled to appear before this Court for a status conference on September 8, 2022.

I write to request a modification of Ms. de Rodriguez's bond conditions such that she be permitted to travel from her home to Philadelphia, Pennsylvania (and through all those jurisdictions in between as are required for her travel) on Saturday, August 20, 2022, and from Philadelphia back to her home on or before Monday, August 22, 2022, in order to celebrate a friend's wedding. While in Philadelphia, Ms. de Rodriguez plans to stay with a friend at an address known to Pretrial Services and agrees to keep Pretrial fully informed of her travel plans and schedule for that weekend.

Pretrial Services, through United States Pretrial Services Officer Assistant Evelyn Alvayero, and the government, through AUSA Kaylan Lasky, both informed me they have no objection to this request. Accordingly, I respectfully request that the Court modify Ms. de Rodriguez's bond such that she be permitted to travel from her home to Philadelphia on August 20, 2022 and return by August 22, 2022.

Thank you for the Court's consideration.

Respectfully submitted,

/s

Aaron Mysliwiec
Attorney for Maria del Carmen Valerio de Rodriguez

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DOCUMENT	
ELECTRONICALLY FILED	
DOC #:	8/1/22
DATE FILED:	8/1/22

CC: Counsel of record
via ECF